

Larsen, Brent

From: Larsen, Brent
Sent: Thursday, December 14, 2017 7:31 AM
To: Floyd, Jim
Subject: RE: RE: GMG290000 Question-Ballast Water Miscellaneous Discharge

Jim:

We are looking at the sentence that says:

Discharge is limited to those times that a visual sheen observation is possible unless the operator uses the static sheen method

Sincerely,

Brent Larsen
Chief
Permitting Section (6WQ-PP)
214-665-7523

From: Floyd, Jim [mailto:Jim.Floyd@chevron.com]
Sent: Wednesday, December 13, 2017 9:03 PM
To: Larsen, Brent
Subject: Re: RE: GMG290000 Question-Ballast Water Miscellaneous Discharge

Brent,

I believe we can take a static sheen, by putting in a sample point. The biggest concern is the wording which says sampling in daytime hours only.

Jim

Sent from my iPhone

On Dec 13, 2017, at 5:05 PM, Larsen, Brent <Larsen.Brent@epa.gov> wrote:

Jim:

Looking at the situations where the static sheen test provides an alternative to the restrictions on visible sheen requirements. Why is it that a sample could not be collected for a static sheen test? Even with a bucket over the side to the through-hull where the discharge would occur, assuming above water line.

Sincerely,

Brent Larsen
Chief
Permitting Section (6WQ-PP)

From: Floyd, Jim [<mailto:Jim.Floyd@chevron.com>]
Sent: Wednesday, December 13, 2017 2:25 PM
To: Larsen, Brent <Larsen.Brent@epa.gov>
Subject: GMG290000 Question-Ballast Water Miscellaneous Discharge

Brent,

I have a question related to the discharge of Ballast Water (Seawater) in the Miscellaneous Discharge Category. The Permit states the following for Ballast Water-

a. Limitations

Free Oil. No free oil shall be discharged. Discharge is limited to those times that a visual sheen observation is possible unless the operator uses the static sheen method. Monitoring shall be performed using the visual sheen method on the surface of the receiving water every day when discharging, or by use of the static sheen method at the operator's option. **Visual sheen observation must be made during daylight in the vicinity of outfalls.** Observation of sheen must be recorded whenever a sheen is observed during the day. The number of days a sheen is observed must be reported.

[Exceptions] Uncontaminated waters may be discharged from platforms that are on automatic purge systems without monitoring for free oil when the facilities are not manned. Additionally, subsea discharges may be discharged without monitoring with the static sheen test when conditions make observation of a visual sheen on the surface of the receiving water impossible. Discharges of muds, cuttings, and cement at the seafloor before installation of the marine riser are exempted from the free oil limitation.

The question is related to Facilities that have the capability to illuminate the water with bridge wing spot lights and other lights which have the capability to see any sheen on the water. There are ballast water systems that are closed loop and have minimal chance of the ballast system being contaminated. Having the ability to perform a visual with the illumination from the facility could reduce possible NPDES Non-Compliances as written for those occasions such as "loading/unloading riser, bunkering fuel, large liquid mud transfers and high current" to name a few.

The permit as written only says visual during daytime, however, there are possible occasions as stated above when a night-time discharge might occur. The problem with discharging of ballast water at night is that the time period it may take to perform a static sheen and finding a location to take a sample such as opening of manway for a sample takes over an hour and this could cause some safety issues.

We feel that we can minimize the necessity to discharge at night to meet the permit requirements, but on those possible instances where it may become necessary to discharge at night would the illumination of the water suffice to meet the above visual sheen requirement?

Could we still perform a visual with illumination if not able to capture a static sheen due to the ballast water system, and then perform a visual during daylight hours?

Thanks for your assistance to this question.

Jim

Jim Floyd
HES Specialist/Advisor-Water

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